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11 | Counsel for Plaintiff and the putative class

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JAVIER HERRERA, individually and on  
behalf of all others similarly situated,

Case No. 3:13-cv-00090-SI

**STIPULATION AND [PROPOSED] ORDER  
EXTENDING DEADLINES RELATED TO  
CLASS CERTIFICATION ISSUES**

Judge: Honorable Susan Illston

19 CREDIT BUREAU OF NAPA COUNTY,  
INC., a California corporation,

*Defendant.*

1 Plaintiff Javier Herrera and Defendant Credit Bureau of Napa County, Inc. (“CBNC”), by  
2 and through their undersigned counsel, hereby stipulate and agree, subject to Court approval, to  
3 extend the current schedule of deadlines related to class certification issues. In support of the  
4 instant stipulation, the Parties state as follows:

5 WHEREAS, on May 6th, the Court entered a Scheduling Order and set, *inter alia*, a  
6 schedule of deadlines related to class certification issues, (Dkt. 25);

7 WHEREAS, following the Court’s entry of the Scheduling Order, Plaintiff served his first  
8 sets of written discovery requests to CBNC and noticed the deposition of an appropriate CBNC  
9 designee pursuant to Fed. R. Civ. P. 30(b)(6);

10 WHEREAS, after an agreed extension of its time to do so, on September 10th, CBNC  
11 served its written responses and objections to Plaintiff’s written discovery requests and indicated  
12 that it was in the process of gathering and would be producing responsive documents and  
13 information;

14 WHEREAS, CBNC’s production of responsive documents and information has required  
15 more time than it initially anticipated, but in any event, will be completed no later than the close of  
16 business Friday, October 18th;

17 WHEREAS, in light of CBNC’s need for additional time to produce responsive documents  
18 and information, to allow sufficient time for Plaintiff to review those documents and information,  
19 for the Parties to meet and confer regarding the same (if necessary), and to proceed with an  
20 appropriate 30(b)(6) deposition, the Parties have conferred and agreed, subject to Court approval,  
21 to extend the current schedule of class certification deadlines as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
<i>Plaintiff to serve disclosures pursuant to Fed. R. Civ. P. 26(a)(2) relating to class certification</i>	October 15, 2013	November 29, 2013
<i>Deadline for Defendant to depose Plaintiff’s experts relating to class certification</i>	November 19, 2013	December 20, 2013

1	<i>Defendant to serve disclosures pursuant to Fed. R. Civ. P. 26(a)(2) of rebuttal expert witnesses and reports relating to class certification</i>	December 19, 2013	January 17, 2014
3	<i>Deadline for Plaintiff to depose Defendant's rebuttal experts relating to class certification</i>	January 17, 2014	February 17, 2014
5	<i>Deadline for Plaintiff to File Motion for Class Certification</i>	January 17, 2014	March 7, 2014
7	<i>Deadline for Defendant to Oppose Motion for Class Certification</i>	February 21, 2014	March 28, 2014
8	<i>Deadline for Plaintiff to Reply in Support of Class Certification</i>	March 14, 2014	April 11, 2014
10	<i>Hearing on Motion for Class Certification</i>	March 28, 2014	April 25, 2014

12                    WHEREAS, good cause exists to extend the current schedule of class certification  
 13 deadlines and the Parties do not seek the relief requested herein for any improper purpose;

14                    NOW THEREFORE, THE PARTIES HEREBY STIPULATE and AGREE:

15                    1.        The current schedule of deadlines related to class certification is hereby extended as  
 16 follows:

17 <b>EVENT</b>	18 <b>CURRENT DEADLINE</b>	19 <b>PROPOSED DEADLINE</b>
20 <i>Plaintiff to serve disclosures pursuant to Fed. R. Civ. P. 26(a)(2) relating to class certification</i>	21                    October 15, 2013	22                    November 29, 2013
23 <i>Deadline for Defendant to depose Plaintiff's experts relating to class certification</i>	24                    November 19, 2013	25                    December 20, 2013
26 <i>Defendant to serve disclosures pursuant to Fed. R. Civ. P. 26(a)(2) of rebuttal expert witnesses and reports relating to class certification</i>	27                    December 19, 2013	28                    January 17, 2014
29 <i>Deadline for Plaintiff to depose Defendant's rebuttal experts relating to class certification</i>	30                    January 17, 2014	31                    February 17, 2014
32 <i>Deadline for Plaintiff to File Motion for Class Certification</i>	33                    January 17, 2014	34                    March 7, 2014

1	<i>Deadline for Defendant to Oppose Motion for Class Certification</i>	February 21, 2014	March 28, 2014
2	<i>Deadline for Plaintiff to Reply in Support of Class Certification</i>	March 14, 2014	April 11, 2014
3	<i>Hearing on Motion for Class Certification</i>	March 28, 2014	April 25, 2014

5 IT IS SO STIPULATED.

6  
7 **JAVIER HERRERA**, individually and on behalf of  
all others similarly situated,

8 Dated: October 15, 2013

9 By: /s/ Benjamin H. Richman  
One of Plaintiff's Attorneys

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19  
20 **CREDIT BUREAU OF NAPA COUNTY, INC.**

21 Dated: October 15, 2013

22 By: /s/ Christopher C. Saldaña  
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**FILER'S ATTESTATION PURSUANT TO CIVIL LOCAL 5-1(i)(3)**

I, Benjamin H. Richman, hereby certify that I am the ECF user whose identification and password are being used to file the foregoing ***Stipulation and [Proposed] Order Extending Deadlines Related to Class Certification Issues***, and that the above-referenced signatory to this stipulation has concurred in this filing.

/s/ Benjamin H. Richman

## **[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS ORDERED THAT:**

The schedule of deadlines related to class certification issues in this matter is hereby extended as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
<i>Plaintiff to serve disclosures pursuant to Fed. R. Civ. P. 26(a)(2) relating to class certification</i>	October 15, 2013	November 29, 2013
<i>Deadline for Defendant to depose Plaintiff's experts relating to class certification</i>	November 19, 2013	December 20, 2013
<i>Defendant to serve disclosures pursuant to Fed. R. Civ. P. 26(a)(2) of rebuttal expert witnesses and reports relating to class certification</i>	December 19, 2013	January 17, 2014
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ENTERED: 10/15/13

*Susan Illston*  
HONORABLE SUSAN ILLSTON  
UNITED STATES DISTRICT JUDGE